

Housing Choice Voucher

Administrative Plan

Summary of Changes

Following is a summary of significant changes to the Parma Public Housing Authority's (PPHA) Housing Choice Voucher (HCV) Administrative Plan (Plan). Recommended changes are based on PIH Notices, U.S. Department of Housing and Urban Development (HUD) guidance and PPHA requested updates.

A significant change is defined as one which changes policy or procedure. Language and grammatical changes are made to improve consistency, reduce duplication, and create an improved format. As these changes do not change policy or procedure they are not listed below. All changes have been provided in a "track changes" format Word document.

- **Chapter 1, F. Owner Outreach:** Change language from "HQS Inspector" to "Staff" will discuss the benefits of the program with landlords. The current language unnecessarily restricts outreach efforts.
- **Chapter 1, I. Equal Access Rule:** The Equal Access Rule requires HUD housing assistance programs be open to all eligible individuals regardless of sexual orientation, gender identity, or marital status.
- **Chapter 2, A. Eligibility Factors:** For consistency with later sections of the Plan, add language that eligibility factors include a criminal background check.
- **Chapter 2, B. Family Composition:** Update definitions related to family composition to comply with HUD guidelines and the Equal Access Rule.
- **Chapter 3, C. Full Application Procedures:** Add language regarding HUD's requirement that applicants provide a list of all States where any family member has resided.
- **Chapter 3, C. Full Application Procedures:** To provide PPHA will greater flexibility prior to an informal review, language is changed to allow for a second opportunity for an appointment if an applicant can show good cause for not contacting the PPHA prior to a missed appointment.
- **Chapter 3, I. Local Preferences:** A local residency preference has been added. Applicant families that reside in Cuyahoga County, are working in Cuyahoga County or who have been notified they will be working in Cuyahoga County at the time of application will receive a preference. The residency preference will be administered in a manner that does not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, gender, ethnic origin, religion, disability, marital status, gender identity, sexual orientation, or age of any member of the applicant family. PPHA will routinely conduct an analysis of need and will examine its' waiting list and participant demographics to determine if the preference has a disparate impact on a protected class. Applicants meeting one or more preferences will qualify as having met the preference criteria.
- **Chapter 3, M. Removal from the Waiting List and Purging:** If an applicant submits more than one application, the newest application will be discarded.

- **Chapter 3, N. Reporting Homeless Status:** HUD requires PHA's to report homeless status on the 50058. PPHA will accept self-certification of homeless status.
- **Chapter 4, B. Exception to Subsidy Standards:** Language added that if the PPHA approves the addition of a minor child to the household, the household may request an exception to the subsidy standard.
- **Chapter 5, A. Briefing Types and Required Attendance:** Recent updates to federal regulations define information that must be included in the briefing session for families exercising their right to portability. The Plan language now describes the required information.
- **Chapter 7, B. Minimum Rent:** Minimum rent has been increased from \$25.00 per month to \$50.00 per month.
- **Chapter 7, N. Exclusions:** HUD provided PHA's some administrative relief in documentation requirements. Language has been added to the Plan which allows for self-certification for fully excluded income and standard verification method requirements for partially excluded income.
- **Chapter 8, B. Initial HQS Inspection:** HUD provided PHA's administrative relief in reinspection requirements. The PPHA will accept pictures or receipts submitted by a landlord to demonstrate repairs have been completed and the unit passes HQS requirements. PPHA will verify the completion of the repairs at the next Annual Inspection.
- **Chapter 8, C. Annual HQS Inspections:** To provide administrative relief to the PPHA in its' administration of the HCV program, language has been added which allows the PPHA to inspect units that pass HQS during the first inspection every other year. If a unit fails the inspection it must be inspected at the next Annual Inspection. The landlord and tenant will both be responsible for allowing entry to the Inspector. Finally, language has been added which indicates that when access to the unit is not provided it is considered a failed inspection.
- **Chapter 9, E. Adjustments to Payment Standards:** Language has been added which clarifies the information that must be provided to HUD in order to request an exception payment standard for persons with disabilities as a reasonable accommodation.
- **Chapter 10, A. Annual Activities:** At each Annual Review, and at each move, every adult household member will be checked against the national Lifetime Sex Offender Registry.
- **Chapter 10, E. Timely Reporting of Changes in Income and Assets:** Clarifies that a decrease in income will be effective the first of the month after all verifications are received.
- **Chapter 11: Moves with Continued Assistance/Portability:** The Plan is updated to meet requirements of federal regulation changes published September 21, 2015. Most significant is the change in administrative fee calculation under the portability rule for receiving PHAs that administer the Voucher. The administrative fee is the lesser of 80% of the initial PHA's administrative fee or 100% of the receiving PHA's administrative fee. In addition, the Voucher expiration date must be at least 30 calendar days after the expiration date of the initial PHA's Voucher expiration date.
- **Chapter 11, B. Restrictions on Moves:** Language added to comply with requirement to notify the HUD Office if a portability move is to be denied due to lack of sufficient funding.
- **Chapter 13, A. Denial or Termination of Assistance:** Clarifies that the PPHA may terminate assistance because of a family's action or failure to act.

- **Chapter 13, A. Denial or Termination of Assistance:** As per 24 CFR 982.552 and 24 CFR 982.553 the PPHA must deny participation if an applicant or a household member has, in the previous three (3) years, been evicted from federally assisted housing for drug-related criminal activity. The PPHA may make an exception if the family member has successfully completed a supervised drug treatment program approved by the PPHA.
- **Chapter 13, A. Denial or Termination of Assistance:** The PPHA must deny admission for an applicant or terminate assistance for a participant if there is reason to believe that a household member's abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.
- **Chapter 13, A. Denial or Termination of Assistance:** This section now defines a look-back period for criminal activity for applicants of three (3) years and a look-back period of five (5) years for eviction from federally assisted housing. An applicant will be denied participation and a participant terminated if any PHA has terminated assistance for a member of the household, if any family member has committed fraud, bribery or any other corrupt or criminal act in connection with a federal housing program, and/or if the family owes money to the PPHA or another PHA unless payment is made in full within seven (7) days.
- **Chapter 13, A. Denial or Termination of Assistance:** PPHA will terminate a participant if it is discovered criminal activity occurred at any time during their current participation in the program.
- **Chapter 13, B. Screening and Termination for Drug Abuse and Other Criminal Activity:** Clarifies that a guest cannot use the assisted unit's address to receive mail or for any photo identification.
- **Chapter 13, B. Screening and Termination for Drug Abuse and Other Criminal Activity:** PPHA will only consider felony-level criminal activity under violent criminal activity.
- **Chapter 13, B. Screening and Termination for Drug Abuse and Other Criminal Activity:** Standards for violation are changed so that a pattern of controlled substance use or alcohol is defined as more than one incident in a 12 month period. Criminal activity also includes the behavior of guests. The look-back period is further defined as three (3) years from the date the act occurred or three (3) years from the disposition of the sentence.
- **Chapter 13, B. Screening and Termination for Drug Abuse and Other Criminal Activity:** Denial of Assistance for Other Criminal Activity - PPHA may prohibit admission of a household to the program, or terminate assistance for a participant based on other criminal activity. Other criminal activity is defined as criminal activity which may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity. Other criminal activity may also include criminal activity which may threaten the health and safety of the owner, property management staff, or persons performing a contract administration function or responsibility on behalf of the PPHA, including a PPHA employee or a PPHA contractor, subcontractor, or agent. Immediate vicinity is defined as within .50 mile of the subsidized unit. Criminal activity will be considered on a preponderance of the evidence. PPHA may reconsider denial if there is sufficient evidence the criminal activity has ceased.

- **Chapter 13, B. Screening and Termination for Drug Abuse and Other Criminal Activity:** Requests for an informal hearing must be received in writing within 15 days of the date of the notice to terminate.
- **Chapter 13, B. Screening and Termination for Drug Abuse and Other Criminal Activity:** The family must be given the opportunity to dispute the criminal background information or provide information of mitigating circumstances before denial of an application or before termination of a participant. The applicant or participant retains their right to an informal hearing after the decision to deny an application or terminate participation in the program. The applicant or participant cannot be charged for the criminal background check.
- **Added Chapter 19, Privacy Protection:** Personally Identifiable Information is defined and notices which provide guidance for protection of the information are listed.

To compile the above changes, all PIH Notices were reviewed for years 2012, 2013, 2014, and 2015 to date. Notices were compared to the Plan and recommended changes bring the Plan into compliance, streamline PPHA operations, and ensure compliance with regulations.

Respectfully submitted by:

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